



MONTGOMERY McCracken

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December 20, 2022

Via ECF

Honorable Paul A. Engelmayer
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: ***In re: One Apus Container Ship Incident on November 30, 2020***
1:22-md-03028-PAE (lead case)

Dear Judge Engelmayer,

We are attorneys for Chidori Ship Holding LLC and Jessica Ship Holding SA, making restricted appearances as owners and bareboat charterers, respectively, of the M/V ONE APUS. We write jointly on behalf of Vessel Interests and NVOCC Interests to confirm the status of our efforts to extend time to claims.

With respect to the Vessel Interests, all of these parties have agreed to extend time to August 31, 2023 to claims currently on suit time extension, and on the same terms as before. In some instances, these extensions have already been granted in writing. It is expected that any outstanding written grants of extended time will happen soon.

As for the NVOCCs, Cargo Interests have requested that some of them also grant extensions of time to August 31, 2023 on the same terms as before. This process is still ongoing.

We note that the current effort required the coordination of dozens of law firms representing over a hundred parties located around the world. This process would normally occur over the course of weeks, and we appear close to completing it in a matter of days.

To our knowledge, no party has been prejudiced in the interim. And, assuming the few remaining requests are addressed soon, the *status quo* should be maintained.

MONTGOMERY McCracken WALKER & RHOADS LLP

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We thank Your Honor for your consideration. If there are any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

**MONTGOMERY MCCracken
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*Attorneys for Defendants
M/V ONE APUS,
Chidori Ship Holding LLC, and
Jessica Ship Holding SA*

/s/ Timothy Semenoro

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CC by ECF to all counsel of record